STN Environmental JV
service disabled veteran owned small business

March 10, 2009

Mr. Jeffrey Kimble
On-Scene Coordinator
Emergency Response Branch
U.S. Environmental Protection Agency, Region 5
9311 Groh Road
Grosse Ile, MI 48138

Subject: **Final Removal Action Letter Report**
Carter Color Coat Removal Site
Detroit, Wayne County, Michigan
Technical Direction Document No. S05-0808-003

Dear Mr. Kimble:

The STN Environmental JV (STN) Superfund Technical Assessment and Response Team (START) which is a joint venture with T N & Associates, Inc. (TN&A) and Sullivan International Group, Inc., has prepared this Final Carter Color Coat Removal Action Letter Report in accordance with the requirements of U.S. Environmental Protection Agency (U.S. EPA) Technical Direction Document (TDD) No. S05-0808-003. The scope of this TDD included (1) assisting in the development of a health and safety plan (2) conducting removal oversight activities (3) conducting air monitoring and air sampling during removal activities, (4) documenting on-site conditions with written logbook notes and digital photographs, and (5) preparing this Final Removal Action Letter Report. Karen Campbell of TN&A was the START representative at the site. Removal activities were conducted by U.S. EPA's Emergency and Rapid Response Services (ERRS) contractor, Environmental Quality Management, Inc (EQM).

This Final Removal Action Letter Report summarizes the site background; discusses the removal action activities conducted including oversight and sampling activities; and provides a summary of the removal action undertaken by U.S. EPA. Enclosure 1 of this letter report presents the figures, Enclosure 2 presents the waste disposal summary table, and Enclosure 3 presents a photographic log of removal actions activities.

Site Location and Background

The Carter Color Coat site is located at 6051 Hastings Street in Detroit, Michigan at 42° 22.184′ north latitude and 83° 03.598′ west longitude (Figure 1). A large six-storey concrete and steel frame building covers approximately one-half of the property. The other half of the property is primarily used for parking. The property is fenced, but not secure. The site is located in a mixed residential and industrial neighborhood with residential properties located approximately one-half mile to the southwest of the site. The site is bordered by Hastings Street to the northeast, Harper Street to the southeast, St. Antoine Street to the southwest, and Piquette Street to the northwest. Other industrial properties surround the site on all four sides (Figure 2).

The building was originally constructed and operated by General Motors Corporation (GMC) Fisher Body Division between 1919 and 1984. Facility operations involved automotive stamping of special discs and tools, dye sets, jigs, and fixtures. GMC generated halogenated and non-halogenated spent solvents, spent plating wastes, and ignitable and corrosive wastes from its operations at this location.

Between 1985 and 1990, the facility was owned and operated by Cameo Color Coat, Inc., after which time the property ownership was transferred to Carter Color Coat. Carter Color Coat operated as a conditionally exempt small quantity generator of hazardous wastes at this facility. Carter Color Coat declared bankruptcy and abandoned the facility in 1993.

GMC conducted a removal action at the property in the early 1990s, removing paints and other hazardous materials from the building.

U.S. EPA conducted a site assessment on December 11, 2008. Michigan Department of Environmental Quality (MDEQ) analytical results showed that hazardous substances were present in on-site 55-gallon drums, above ground storage tanks (ASTs), sumps, and underground storage tanks (USTs). The drums have been buried and the conditions at the time of their investigation are unknown. The ASTs and sumps were open and exposed to the elements. The condition of the UST was also unknown at that time. These vessels contain Resource Conservation and Recovery Act (RCRA) hazardous wastes as defined by the following waste codes: D001 (characteristic of ignitibility); D002 (characteristic of corrosivity); and D007 and D008 (characteristic of toxicity). Since polychlorinated biphenyls (PCBs) were detected during the U.S. EPA site assessment, and

MDEQ site assessment report indicated the presence of other hazardous materials, a removal action was warranted at this site. Based on the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as listed under Title 40 of the *Code of Federal Regulations* (CFR), Section 300.415, U.S. EPA conducted removal actions to abate, prevent, minimize, stabilize, mitigate, or eliminate a release or potential release that poses a threat to the public health or welfare of the United States or the environment.

Removal Action Activities

Removal action activities at the site included removing loose potential asbestos containing material (ACM) throughout the building; extracting the PCB-contaminated wood block flooring; decommissioning four ASTs located on site; and removing the debris throughout the building and truck ramp. A chronological order of site activities is discussed below.

On September 17, 2008, the U.S. EPA and its contractors mobilized to the site to conduct removal activities. The removal activities began with site preparations and included repair of the fence surrounding the site, and the delivery of site trailers, portable restrooms, and a generator. The U.S. EPA contractor began clearing and grubbing the weeds and brushes in the parking lot (Figure 2). Security guard services were procured for 24-hours surveillance of the site.

During the remainder of the week, U.S. EPA contractors completed the clearing and grubbing of the parking lot area, repaired the fence, and performed site safety improvements throughout the building including identifying and marking existing holes in the floors with caution tape and barriers.

During the week of September 22, 2008, the asbestos contractors removed potential ACM from the first, second, third, fourth, fifth, sixth, and seventh floors of the building and loose transite from outside the building. ACM removal was conducted by Qualified Abatement Services located in Detroit, Michigan. All asbestos removal activities were conducted in Level C personal protection equipment (PPE). The ACM was placed in bags marked as asbestos material and then double bagged. As required under 29 CFR 1910.1001, asbestos personal air samples were collected from a minimum of 25 percent of the asbestos contractor (3) personnel for evaluation of potential asbestos exposure. The three low-flow personal air samples were collected from the asbestos contractors and sent to EMSL Analytical, Inc. in Ann Arbor, Michigan for total fiber count analysis using Phase Contrast Microscopy (PCM) by NIOSH Method 7400 and 29 CFR 1910.1001. Three additional air samples

were collected and analyzed using NIOSH Method 7400 from EQM personnel conducting removal activities of the PCB-contaminated wood block flooring during the week after the asbestos removal was conducted to ensure the safety of EQM personnel. Three field blanks were also submitted for fiber count analysis.

A total of 40 cubic yard (yd^3) of potential ACM was transported off-site on September 24, 2008, by Qualified Abatement Services (Table 1) and disposed of at Sauk Trails Landfill located in Canton, Michigan. On September 26, 2008, U.S. EPA and its contractors conducted a walkthrough of the entire building to ensure all free and loose asbestos was removed. Intact asbestos pipe wrapping and floor tile mastic at the site was not removed during this removal action.

The PCM fiber count personal air sample results for samples collected on September 25 and 26, 2008, showed that one personal air sample, collected from the asbestos contractors on September 25, 2008, had a result of "overloaded" and was not analyzed by the laboratory. All personnel wore Level C PPE. All of the other samples collected throughout the asbestos removal and the removal of PCB-contaminated wood block floor were below the NIOSH and Occupational Safety and Health Agency (OSHA) requirement of less than 0.1 fiber per cubic centimeter of air (0.1 fiber/cm^3).

U.S. EPA contractors also continued site safety improvements and began PCB-contaminated wood block removal on the first floor. A sample, CCC-First Floor, was collected September 26, 2008, from the dry solids remaining on the first floor after of the PCB-contaminated wood block flooring was removed and staged on site for disposal. The sample of the remaining dry solids was hand delivered to Bureau Veritas in Novi, Michigan for PCB analysis by SW 846 Method 8082.

During the week of September 29, 2008, U.S. EPA contractors prepared for moving the removal equipment to the various floors in the building. Another 40 yd^3 of potential ACM was taken off site for transportation and disposal by Qualified Abatement Services on September 29, 2008. The contractors moved the removal equipment to the second floor of the building on October 1, 2008, and continued moving the pile of PCB-contaminated wood blocks to a stockpile area in preparation of off-site disposal. The platform for hoisting the removal equipment onto the various building floors was delivered to the site. MDEQ Chad Rogers was on site to inspect asbestos clean up on October 1, 2008. Prior to the removal, MDEQ received information about loose ACM on site.

U.S. EPA and its contractors located a UST that was documented in the MDEQ assessment. U.S. EPA and its contractors attempted to open the UST and collect a sample. The UST could not be opened to determine contents. Therefore, the UST was determined not to pose a threat. On October 3, 2008, U.S. EPA contractors collected sample, CCC-Second Floor, of the remaining dry solids on the second floor after the PCB-contaminated wood block was removed. On October 4th, a film crew from a local college was on site filming. The film crew was limited to filming in the parking area of the property and was escorted while on the property.

During the week of October 6, 2008, U.S. EPA contractors completed removal of the remaining PCB-contaminated wood block flooring from the second floor and moved the equipment from the second floor up to the third floor of the building. U.S. EPA contractor hand delivered sample CCC-Second Floor, to Bureau Veritas in Novi, Michigan to be analyzed for PCBs by method SW 846 8082. On October 8, 2008, MDEQ was on site to monitor progress of the site cleanup. On October 9, 2008, the City of Detroit was on site to discuss access issues associated with the site property. U.S. EPA contractors also began conducting transportation and disposal of PCB-contaminated wood block flooring and debris. Approximately 480 yd^3 of PCB-contaminated wood block flooring and debris were transported off-site for disposal during the week. PCB analytical results received from the second floor sample of dirt debris showed 40 milligram per kilogram (mg/Kg) of Aroclor 1254.

During the week of October 13, 2008, U.S. EPA contractors continued removing and stockpiling the PCB-contaminated wood block flooring from the third floor of the building. A crane was on site on October 16, 2008, to move the removal equipment to the fifth floor. U.S. EPA contractors began removing the PCB-contaminated wood block flooring on the fifth floor and continued transportation and disposal of the PCB-contaminated wood block flooring and debris. Approximately 1,040 yd^3 of PCB-contaminated wood block flooring and debris were transported off-site for disposal. A sample, CCC-Third Floor, was collected on October 14, 2008 from the remaining dry solids on the third floor of the building for PCB analysis by EPA Method SW 846 8082. The sample was hand delivered to the Bureau Veritas laboratory.

During the week of October 20, 2008, U.S. EPA contractors continued removing the PCB-contaminated wood block flooring from the fifth floor of the building and stockpiling the material outside. U.S. EPA contractors also continued conducting transportation and disposal of PCB-contaminated wood block flooring and debris. Approximately 880 yd^3 of PCB-contaminated wood block flooring and debris were transported off-site for disposal. U.S. EPA received PCB sample results on October 21, 2008, from the sample collected from the